

The Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

SOLOWHEEL, INC.,

Plaintiff,

v.

NINEBOT INC. (USA), D/B/A NINEBOT
U.S., INC.; NINEBOT (TIANJIN)
TECHNOLOGY CO., LTD.; NINEBOT,
INC. (China),

Defendants.

Case No. 3:16-cv-05688-RBL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

**NOTE ON MOTION CALENDAR:
June 27, 2018**

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Solowheel, Inc. (“Solowheel”) and Defendant Ninebot (Tianjin) Technology Co., Ltd (“Ninebot”) hereby stipulate and jointly move the Court for extensions regarding all remaining deadlines set forth in the Court’s January 16, 2018 Order Granting Stipulation and Joint Motion to Extend Deadlines (D.I. 31). The reason for this Stipulation and (Proposed) Order to Extend Deadlines is that (i) the parties are involved in extensive discussions toward settlement of all pending issues, and believe the additional time requested shall facilitate such resolution, and (ii) the parties desire to ensure consistency and coherence between the dates established in the foregoing orders, to ensure timely completion of all stages of

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the case. The proposed extension of deadlines follows the Court's Local and Patent Rules and is as follows:

	Original Date	Proposed Date
Joint Claim Construction	June 7, 2018	August 27, 2018
Claim Construction Expert Disclosures	June 7, 2018	August 27, 2018
Completion of Claim Construction Discovery	July 27, 2018	September 27, 2018
Opening Claim Construction Brief	August 1, 2018	October 1, 2018
Responsive Claim Construction Brief	August 16, 2018	October 16, 2018
Markman hearing at 09:00 AM	<i>To be determined.</i>	<i>To be determined.</i>
Expert Witness Disclosure/Reports under FRCP 26(a)(2)	July 12, 2018	<i>To be determined.</i>
Rebuttal Expert Disclosure/Reports	August 10, 2018	<i>To be determined.</i>
Motions	August 17, 2018	<i>To be determined.</i>
Completion of discovery (fact and expert)	September 10, 2018	<i>To be determined.</i>
Dispositive motions	October 5, 2018	<i>To be determined.</i>
Attorney settlement conference	November 30, 2018	<i>To be determined.</i>
Mediation to be completed	December 10, 2018	<i>To be determined.</i>
Motions in Limine	December 10, 2018	<i>To be determined.</i>
Pretrial Order	December 26, 2018	<i>To be determined.</i>
Trial briefs	January 2, 2019	<i>To be determined.</i>
Voire dire/jury instructions	January 2, 2019	<i>To be determined.</i>

The Parties acknowledge the proposed extension of deadlines may impact later dates, and will adhere to any subsequent resetting of deadlines which the Court deems appropriate. A Proposed Order is below.

Dated: June 27, 2018

Respectfully submitted,

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Ninebot (Tianjin) Technology Co., Ltd.*

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED

DATED this ____ day of _____, 2018.

THE HONORABLE RONALD B. LEIGHTON
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Al Van Kampen, hereby certify that on June 27, 2018, the foregoing document was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which transmits notification of the filing to the following persons:

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By: s/ Al Van Kampen
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